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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,)	
)	CRIMINAL NO. 4:12-cr-036
Plaintiff,)	
)	<u>INDICTMENT</u>
v.)	
)	18 U.S.C. § 1347
ANGELA ELLISON,)	18 U.S.C. § 1028A
)	18 U.S.C. § 1957
Defendant.)	18 U.S.C. § 2
)	

THE GRAND JURY CHARGES:

COUNT 1
(Health Care Fraud - Medicaid)

On or between approximately May 29, 2007, through approximately February 16, 2010, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, did knowingly and willfully execute, and attempt to execute, a scheme or artifice to obtain by means of materially false and fraudulent pretenses, representations, and promises, any of the money and property owned by, and under the custody and control of, a health care benefit program, namely Medicaid, in connection with the delivery of or payment for health care benefits, items, and services, by submitting, and causing others to submit, false and fraudulent claims for services represented to have had been performed for Cornerstone Counseling Center by various doctors, which had not been performed by them, and thereby obtaining payment to which Cornerstone Counseling Center was not entitled, in an amount estimated to be in excess of \$500,000.

All in violation of Title 18, United States Code, Sections 1347 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Health Care Fraud - Wellmark Blue Cross and Blue Shield)

On or between approximately February 28, 2007, and approximately March 2, 2010, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, did knowingly and willfully execute, and attempt to execute, a scheme or artifice to obtain by means of materially false and fraudulent pretenses, representations, and promises, any of the money and property owned by, and under the custody and control of, a health care benefit program, namely Wellmark Blue Cross and Blue Shield, in connection with the delivery of or payment for health care benefits, items, and services, by submitting, and causing others to submit, false and fraudulent claims for services represented to have been performed for Cornerstone Counseling Center by various doctors, which had not been performed by them, and thereby obtaining payment to which Cornerstone Counseling Center was not entitled, in an amount estimated to be in excess of \$200,000.

All in violation of Title 18, United States Code, Sections 1347 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 3

(Health Care Fraud - Aetna)

On or between approximately November 11, 2007, and approximately January 5, 2010, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, did knowingly and willfully execute, and attempt to execute, a scheme or artifice to obtain by means of materially false and fraudulent pretenses, representations, and promises, any of the money and property owned by, and under the custody and control of, a health care benefit program, namely Aetna, in connection

with the delivery of or payment for health care benefits, items, and services, by submitting, and causing others to submit, false and fraudulent claims for services represented to have been performed for Cornerstone Counseling Center by various doctors, which had not been performed by them, and thereby obtaining payment to which Cornerstone Counseling Center was not entitled, in an amount estimated to be in excess of \$3,000.

All in violation of Title 18, United States Code, Sections 1347 and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNT 4
(Health Care Fraud - United Health Insurance)**

On or between approximately January 11, 2008, and approximately December 10, 2008, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, did knowingly and willfully execute, and attempt to execute, a scheme or artifice to obtain by means of materially false and fraudulent pretenses, representations, and promises, any of the money and property owned by, and under the custody and control of, a health care benefit program, namely United Health Insurance, in connection with the delivery of or payment for health care benefits, items, and services, by submitting, and causing others to submit, false and fraudulent claims for services represented to have had been performed for Cornerstone Counseling Center by various doctors, which had not been performed by them, and thereby obtaining payment to which Cornerstone Counseling Center was not entitled, in an amount estimated to be in excess of \$6,000.

All in violation of Title 18, United States Code, Sections 1347 and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 5
(Aggravated Identity Theft - O.K.)

On or about approximately February 8, 2007, through approximately March 27, 2009, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, during and in relation to the offense of health care fraud, as alleged in counts one through four of this indictment, did knowingly use, without lawful authority, a means of identification of another person, namely the name and national provider identification of O.K., a physician, whose identity is known to the grand jury.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 6
(Aggravated Identity Theft - D.D.)

On or about approximately July 27, 2009, through approximately March 2, 2010, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, during and in relation to the offense of health care fraud, as alleged in counts one through three of this indictment, did knowingly use, without lawful authority, a means of identification of another person, namely the name and national provider identification of D.D., a physician, whose identity is known to the grand jury.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNT 7
(Aggravated Identity Theft - B.D.)**

On or about approximately August 20, 2007, through approximately September 18, 2009, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, during and in relation to the offense of health care fraud, as alleged in counts one and two of this indictment, did knowingly use, without lawful authority, a means of identification of another person, namely the name and national provider identification of B.D., a doctor of psychology, whose identity is known to the grand jury.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNT 8
(Aggravated Identity Theft - K.K.)**

On or about approximately February 8, 2007, through approximately March 27, 2009, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON, during and in relation to the offense of health care fraud, as alleged in counts two and four of this indictment, did knowingly use, without lawful authority, a means of identification of another person, namely the name and national provider identification of K.K., a physician, whose identity is known to the grand jury.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

**COUNT 9
(Money Laundering)**

On or about February 16, 2009, in the Southern District of Iowa and elsewhere, defendant ANGELA ELLISON knowingly engaged and attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, that is derived from a specific unlawful activity, namely health care fraud.

All in violation of Title 18, United States Code, Sections 1957(a), and 1956(c)(7)(F).

A TRUE BILL.

/s/
FOREPERSON

Nicholas A. Klinefeldt
United States Attorney

By: /s/ Craig Peyton Gaumer
Craig Peyton Gaumer
Assistant United States Attorney